

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)</p> <p>RUBIN, EHRLICH & BUCKLEY, P.C. BY: GLORIA R. BUCKLEY, ESQUIRE (GRB 8973) CROSSROADS CORPORATE CENTER 3150 BRUNSWICK PIKE, SUITE 310 LAWRENCEVILLE, NEW JERSEY 08648 (609) 637-9500 (609) 637-0001 - Facsimile GBuckley@lawreb.com Attorneys for Secured Creditor Wilmington Trust, National Association as Trustee on Behalf of the Holders of B2R Mortgage Trust 2015-1 Mortgage Pass-Through Certificates</p>	
<p>In Re:</p> <p>GEI HOLDINGS, L.L.C.</p>	<p>Case No.: 16-24991(VFP)</p> <p>Chapter 11</p> <p>Hearing Date: August 23, 2016 at 10:00 AM</p> <p>Judge: Vincent F. Papalia</p>

**NOTICE OF MOTION FOR RELIEF FROM THE
AUTOMATIC STAY/DISMISSAL; PROHIBITING THE USE OF CASH COLLATRAL
and related relief**

TO: All Parties on the Attached Service List

PLEASE TAKE NOTICE that on August 23, 2016 at 10:00 a.m., Wilmington Trust, National Association as Trustee on Behalf of the Holders of B2R Mortgage Trust 2015-1 Mortgage Pass-Through Certificates (“Wilmington Trust”) by and through its counsel, Rubin, Ehrlich & Buckley, P.C., shall move before the Honorable Vincent F. Papalia, U.S.B.J. at the United States Bankruptcy Court, M.L. King, Jr. Federal Building & Courthouse, 50 Walnut

Street, 3B, Newark, New Jersey, for the entry of an Order dismissing Debtor's case pursuant to 11 U.S.C. 1307 (c) , 11 U.S. C. 362 (c); or in the alternative for an Order granting Wilmington Trust Prospective relief from the automatic stay pursuant to 11 U.S.C. § 362(d)(1) & (2), 11 U.S.C 362 (c) or, in the alternative, pursuant to 11 U.S, C, 363 (e) prohibiting the Debtor's use of cash collateral, or in the alternative pursuant to 11 U.S.C. § 361 and 362(d)(1) and/or(3)(B)(i) or (ii), adequate protection payments; and such other relief as the court deems equitable and just.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Wilmington Trust will rely upon the Affidavit of Angela Gonzales, Senior Asset Manager of Midland Loan Services, Inc., a division of PNC Bank National Association, it's servicer and supporting Exhibits and a Memorandum of Law submitted herewith, Certification of Sewer and Tax Liens, Certification opposing the use of Cash Collateral and in support of Prospective relief due to the Debtor's serial filings. A proposed form of Order is also being submitted with this Motion.

PLEASE TAKE FURTHER NOTICE that opposition to this Motion, if any, must be filed with the Clerk of the Bankruptcy Court and served upon the undersigned counsel no later than seven days prior to the return date of this Motion.

RUBIN, EHRLICH & BUCKLEY, P.C.
Attorneys for Secured Creditor
Wilmington Trust, National Association as
Trustee on Behalf of the Holders of B2R
Mortgage Trust 2015-1 Mortgage Pass-Through
Certificates

By: ss//Gloria R. Buckley
Gloria R. Buckley

Dated: 8/8/16

IN RE: GEI HOLDINGS, L.L.C.
CASE NO. 16-24991

SERVICE LIST

GEI Holdings, LLC
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Honorable Vincent F. Papalia
United States Bankruptcy Court
M.L. King Jr. Federal Bldg. & Courthouse
50 Walnut Street
Newark, New Jersey